LAGOMARSINO LAW 1 ANDRE M. LAGOMARSINO, ESQ. Nevada Bar No. 6711 2 CHAD D. FUSS, ESO. Nevada Bar No. 12744 3005 W. Horizon Ridge Pkwy., #241 4 Henderson, Nevada 89052 Telephone: (702) 383-2864 5 Facsimile: (702) 383-0065 Email: aml@lagomarsinolaw.com 6 Email: chad@lagomarsinolaw.com Attorneys for Plaintiff John Cunningham 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 JOHN CUNNINGHAM, an individual CASE NO.: 2:17-CV-02296-RFB-CWH 11 Plaintiff, 12 STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE v. 13 FOR PLAINTIFF TO RESPOND TO OPERATOR, COLISEUM LLC DBA **DEFENDANTS' MOTION FOR** 14 BREWSKE'S, Nevada Limited Liability a SUMMARY JUDGEMENT, OR IN THE 15 Company; MANAGEMENT COMPANY, LLC, ALTERNATIVE FOR PARTIAL a Nevada Limited Liability Company; CHAD SUMMARY JUDGEMENT (ECF NO. 32) 16 TYSON, an individual; BEAU WILLIAMS, an individual; 17 Defendants. 18 19 The parties hereby stipulate, and respectfully request, that Plaintiff be given an extension to 20 respond to Defendants' Motion for Summary Judgement, or in the Alternative for Partial Summary 21 Judgement (ECF No. 32). There exists good cause for the extension. Due to scheduling conflicts 22 counsel have agreed to take the depositions of two witnesses (Beau Williams and Defendants' FRCP 23 30(b)(6) designees) outside of discovery, on May 3, 2019. As such, Counsel would like to wait until 24 after the depositions have been completed to submit their Response and Reply. The proposed new 25 dates are as follows: 26 27 28

| 1 | Deadlines | Current Dates | Proposed Dates |
|--------|---|---|-----------------------|
| 2 | Plaintiff's Response to Defendants' Motion for Summary Judgement, or in the Alternative for | Monday, April 1, 2019 | Friday, May 31, 2019 |
| 3 | Partial Summary Judgement Defendants' Reply to Plaintiff's Response to | Monday, April 15, | Friday, June 14, 2019 |
| 4 5 | Defendants' Motion for Summary Judgement, or in the Alternative for Partial Summary Judgement | 2019 | |
| 6 | - buagemen | | 1 |
| 7 | Dated this 28 th day of March, 2019. | Dated this 28 th day of March, 2019. | |
| 8 | SUTTON HAGUE LAW CORPORATION, P.C | .C. LAGOMARSINO LAW | |
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| 10 | <u>/s/ Jared Hague</u> S. BRETT SUTTON, ESQ. | <u>/s/ Chad D. Fuss</u> ANDRE M. LAGOMARSINO, ESQ. | |
| 11 | Nevada Bar No. 12109 | Nevada Bar No. 6711 CHAD D. FUSS, ESQ. Nevada Bar No. 12744 | |
| 12 | JARED HAGUE, ESQ. Nevada Bar No.12761 | | |
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| 5 | Email: Brett@suttonhague.com Email: Jared@suttonhague.com | tue.com Email: chad@lagomarsinolaw.com s Coliseum Attorneys for Plaintiff John Cunningham | |
| 6 | Attorneys for Defendants Coliseum | | |
| 7 | Operators, LLC dba Brewske's, and Management Company, LLC | | |
| 8 | ana Managemeni Company, EEC | | |
| 9 | Cunningham v. Coliseum Operators, LLC, et. al 2:17-cv-02296-RFB-VCI | | |
| 20 | | | 2:17-cv-02290-RFB-VC |
| 21 | ORDER | | |
| 2 | | | |
| 3 | IT IS SO ORDERED: | R | |
| 4 | RICHARD F. BOULWARE, II | | |
| 5 | UNITED STATES DISTRICT JUDGE | | |
| - 11 | DATED this 1st day of April, 2019. | | |
| 6 | DA | TED tills Tst day of April | , 201). |

28